1 PATRICK L. FORTE, #80050 ANNE Y. SHIAU, #273709 LAW OFFICES OF PATRICK L. FORTE 2 One Kaiser Plaza, #480 3 Oakland, CA 94612 Telephone: (510) 465-3328 Facsimile: (510) 763-8354 4 5 Attorneys for Debtors 6 7 8 UNITED STATES BANKRUPTCY COURT 9 NORTHERN DISTRICT OF CALIFORNIA 10 Case No. 10-44186 RE In re: 11 CHRISTOPHER LEE SCOTT and Chapter 13 VENUS CALIP SCOTT, 12 REOUEST TO ENTER JUDGMENT VOIDING LIENS OF WORKMAN TRUST Debtors. 13 AND ITS SUCCESSORS IN INTEREST 14 15 16 Debtors Christopher and Venus Scott ("Debtors") hereby request 17 the court enter a judgment voiding the lien of Robert I. Workman and 18 Suzanne C. Workman, Trustees, Workman Trust of 1993, dated August 9, 19 1993 and its successors in interest secured against Debtors' property 20 located at 1857 Pacheco Blvd. Unit B, Martinez, CA 94553 ("the 21 property"). 22 1. This request is based on the petition, schedules, and 23 documents on file herein, the Motion to Value Security of Workman 24 Trust, Memorandum of Points and Authorities in Support of the Motion 25 and Declaration of Debtor in Support of the Motion filed on June 15,

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2010, and subsequent Order Valuing the Liens of Workman Trust entered on July 13, 2010.

- 2. On July 20, 2010, Debtors' chapter 13 plan, which stated Debtors' intention to strip the second and third liens of Sue Workman/Workman Trust from their residence, was confirmed. Sue Workman/Workman Trust is also known as Robert I. Workman and Suzanne C. Workman as Trustees for the Workman Trust of 1993, dated August 9, 1993.
- 3. On May 27, 2015, a Notice of Plan Completion and Request for Discharge was filed.
- 4. On May 30, 2015, an Order Discharging 13 Debtor After Plan Completion was entered.

Based on the foregoing, Debtors pray that:

1. The court will enter an appropriate form of judgment determining the liens to be entirely, permanently, and for all purposes void and unenforceable.

Dated: June 16, 2015 Anne Y. Shiau /s/ ANNE Y. SHIAU Attorney for Debtors

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